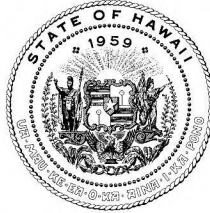


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May 21, 2009

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

**LOG NO: 2009.1900  
DOC NO: 0905ST08  
Architecture**

Dear Mr. Yoshioka:

**SUBJECT: Section 106 (NHPA) Consultation  
Honolulu High-Capacity Transit Corridor Project  
Historic Effects Determination Report  
Island of O'ahu  
TMK: (1) (various)**

This is in response to your transmittal, dated April 15, 2009 and received in our office on April 16, 2009. The submitted Historic Effects Determination Report (Report) was completed for the U.S. Department of Transportation Administration (FTA) and the City and County of Honolulu's Department of Transportation Services (DTS) to address the effects on the integrity of historic properties as triggered by the proposed undertaking, the Honolulu High-Capacity Transit Corridor Project (HHCTCP/Project). The grade-separated, fixed guideway rail transit system is proposed for the 20-mile section of the Project between East Kapolei and Ala Moana Center, including the Airport route which was chosen over the Salt Lake route option.

The Report identifies 499 properties "as constructed or developed by or before 1968": 9 listed in the NRHP, 74 eligible for listing (where 2 eligible have since been demolished), (therefore 416 are not eligible). Of 81 identified National Register of Historic Places (NRHP) listed and eligible properties within the Project's Area of Potential Effects (APE), the determinations are: 22 "adverse effect"; 51 "no adverse effect"; and 8 "no effect".

According to the Report, the FTA and DTS state their compliance with requirements of Section 106 of the National Historic Preservation Act of 1966 (as amended):

"to consider the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP." The Criteria for Evaluation (36 CFR 60) are applied to NRHP-listed and -eligible properties: "the quality of significance in American history, architecture, archaeology, engineering, and culture ... present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association (Criteria A, B, C, and D)." In addition, Criteria Considerations were applied to properties "that have achieved significance within the past 50 years" (categories a, b, c, d, e, f, and g).

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The Report acknowledges that an examination of settings should not only involve “features and their relationships ... within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.” The Report states that it addresses our previously expressed concerns of indirect effects, including impedance of customary viewplanes, changes to scale and character/integrity of setting, feeling, and association. The Report now addresses indirect effects of guideway crossings on Nuuanu and Honouliuli Stream Bridges and effects to the Chinatown Historic District, and the Oahu Railway & Land Co. Terminal & Document Storage Buildings.

However, assessments do not adequately discuss “topographic features (a gorge or the crest of a hill); vegetation; simple manmade features (paths or fences); and relationships between buildings and other features or open spaces” that it acknowledges to address. It does not adequately consider the effect of the undertaking with consideration of “the quality of significance in American history, architecture, archaeology, engineering, and culture ... present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association” that it acknowledges to address. It does not adequately address elimination of primary views, restriction of access. It does not adequately and appropriately address national historic landmarks.

We disagree with the “no adverse effect” findings for the following historic properties.

- Pearl Harbor National Historic Landmark (NHL) and World War II Valor in the Pacific National Monument;
- CINCPAC Headquarters NHL;
- Aiea (Honolulu Plantation) Cemetery;
- Tong Fat Wood Tenement Buildings;
- Aloha Tower;
- Walker Park;
- Irwin Park;
- Pier 10/11;
- DOT Harbors Division Building;
- Merchant Street Historic District;
- HECO Downtown Plant and Leslie A. Hicks Building;
- Six Quonset hut grouping along Dillingham Boulevard;
- Boulevard Saimin (formerly on the original list of 7 with an “adverse effect”);
- Solmirin House (also one of original 7 and now not addressed);
- Radford High School (a determination was pending and is not addressed).

Additional before-and-after simulations would help to analyze the character of visual and atmospheric effects and parcel takings to these resources. We request verification that the former Naval Air Station Barber’s Point and lands west of the West Loch station will be consulted on in a separate Draft EIS. We continue our concerns regarding effects to the former Marine Corps Air Station Ewa Field.

Given our concerns and those of consulting parties regarding these effect determinations, we anticipate further discussions towards draft mitigation commitments that include our concerns on affected parcel acquisitions and displacements.

Thank you for the opportunity to comment. Should you have any additional questions or concerns, please call Susan Tasaki at (808) 692-8015.

Sincerely,

Nancy A. McMahon  
Deputy State Historic Preservation Officer

c:

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